

Presentment Date and Time: September 7, 2010 at 12:00 noon (Eastern Time)
Objection Deadline: September 7, 2010 at 11:30 a.m. (Eastern Time)

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and Safeco Insurance Company of America

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	09-50026 (REG)
f/k/a General Motors Corp. et al.	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF PRESENTMENT FOR ENTRY OF
STIPULATION AND AGREED ORDER APPROVING TRANSFER OF
CERTAIN SURETY BONDS AND RELATED COLLATERAL TO
GENERAL MOTORS LLC AND FOR AMENDMENT OF PENDING CLAIMS**

PLEASE TAKE NOTICE that Liberty Mutual Insurance Company (“**Liberty**”) and Safeco Insurance Company of America (“**Safeco**”) will present the stipulation and agreed order (the “**Stipulated Order**”) between Motors Liquidation Company (f/k/a

General Motors Corporation) (“**MLC**”) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), Liberty, Safeco and General Motors LLC, successor by conversion to a Delaware limited liability company, of the Delaware corporation formerly known as General Motors Company (f/k/a NGMCO, Inc.)(“**New GM**” and, collectively with MLC, the Debtors, Liberty and Safeco, the “**Parties**”), attached hereto, pursuant to 11 U.S.C. §§ 105, 363(b), (f), and (m), and 365, and the order (the “**Sale Order**”) authorizing and approving (i) the sale of substantially all of the Debtors’ assets pursuant to a proposed Master Sale and Purchase Agreement and related agreements (the “**MPA**”) among the Debtors and New GM, free and clear of liens, claims, encumbrances, and other interests, (ii) the assumption and assignment of certain executory contracts and unexpired leases of personal property and of nonresidential real property, and (iii) the approval of the UAW Retiree Settlement Agreement, subject to higher or better offers (the “**363 Transaction**”), all as more fully set forth in the Stipulated Order, to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for approval and signature at Room 621 of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), One Bowling Green, New York, New York 10004 on **September 7, 2010 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Stipulated Order must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable

Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph M. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 300 Renaissance Center, Detroit, Michigan 48245 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel, LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) the members of the Official Committee of Unsecured Creditors Holding Asbestos Related

Claims; (xi) Honigman Miller Schwartz and Cohn, LLP, the attorneys for General Motors LLC, 2290 First National Building, 660 Woodward Avenue, Detroit, Michigan 48226 (Attn: Robert B. Weiss and Seth A. Drucker); (xii) Leo & Weber, P.C., the attorneys for Safeco Insurance Company of America and Liberty Mutual Insurance Company, One N. LaSalle Street, Suite 3600, Chicago, Illinois 60602 (Attn: T. Scott Leo and Grace Winkler Cranley); and (xiii) Torre, Lentz, Gamell, Gary & Rittmaster, LLP, the attorneys for Safeco Insurance Company of America and Liberty Mutual Insurance Company, 100 Jericho Quadrangle, Suite 309, Jericho, New York 11753 (Attn: Mark S. Gamell and Steven H. Rittmaster), so as to be received no later than **September 7, 2010 at 11:30 a.m. (Eastern Time)** (the “**Objection Deadline**”).

Dated: Jericho, NY
August 17, 2010

/s/ Mark S. Gamell
Mark S. Gamell (MG-3506)
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